IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

WILLIAM JAMESON : CIVIL ACTION

v. : NO. 02-2802

JOHN J. RIGAS, MICHAEL J. RIGAS, TIMOTHY J. RIGAS, and JAMES P. RIGAS

ERNEST PEDATA : CIVIL ACTION

v. : NO. 02-2901

JOHN J. RIGAS, MICHAEL J. RIGAS, TIMOTHY J. RIGAS, and JAMES P. RIGAS

DAVID SORENSON : CIVIL ACTION

v. : NO. 02-3158

JOHN J. RIGAS, MICHAEL J. RIGAS, TIMOTHY J. RIGAS, and JAMES P. RIGAS

HAROLD WEINER : CIVIL ACTION

v. : NO. 02-3211

JOHN J. RIGAS, MICHAEL J. RIGAS, TIMOTHY J. RIGAS, and JAMES P. RIGAS

BRIAN SMITH : CIVIL ACTION

v. : NO. 02-3625

JOHN J. RIGAS, MICHAEL J. RIGAS, TIMOTHY J. RIGAS, and JAMES P. RIGAS

KURT MEYLE : CIVIL ACTION

v. : NO. 02-3699

JOHN J. RIGAS, MICHAEL J. RIGAS, TIMOTHY J. RIGAS, and JAMES P. RIGAS

JEFFREY J. HYSLIP : CIVIL ACTION

v. : NO. 02-3768

JOHN J. RIGAS, MICHAEL J. RIGAS, TIMOTHY J. RIGAS, and JAMES P. RIGAS

SCOTT BURNSIDE : CIVIL ACTION

v. : NO. 02-3769

JOHN J. RIGAS, MICHAEL J. RIGAS, TIMOTHY J. RIGAS, and JAMES P. RIGAS

WILLIAM SPADA : CIVIL ACTION

v. : NO. 02-3858

JOHN J. RIGAS, MICHAEL J. RIGAS, TIMOTHY J. RIGAS, and JAMES P. RIGAS

DECLARATION OF DEBORAH R. GROSS IN SUPPORT OF THE MOTION OF INTERNATIONAL BROTHERHOOD OF TEAMSTERS, LOCAL 705 PENSION FUND FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF, AND FOR APPROVAL OF SELECTION OF LEAD AND LIAISON COUNSEL

- Deborah R. Gross, declares, under penalty of perjury:
- 1. I am with the law firm of Law Offices Bernard M. Gross, P.C. ("Law Offices Bernard M. Gross, P.C."), one of plaintiff's counsel in the action entitled <u>William Jameson v. John J. Rigas, et al.</u>, No. 02-CV-2802 (the "<u>Jameson Action</u>"). I submit this Declaration in support of the motion of International Brotherhood of Teamsters, Local 705 Pension Fund ("Local 705") for consolidation, appointment as Lead Plaintiff and for approval of selection of Lead and Liaison Counsel.
- 2. Attached hereto as Exhibit A is a true and accurate copy of the complaint filed in the <u>Jameson</u> Action. Attached to the complaint is a true and accurate copy of the certification which demonstrates plaintiff's class standing and requisite financial interest in the outcome of this litigation.
- 3. Attached hereto as Exhibit B is a true and accurate copy of the notice published by plaintiff in the <u>Jameson</u> Action on the <u>Business Wire</u>, a national, business-oriented newswire service, on May 10, 2002.
- 4. Attached hereto as Exhibit C is a true and accurate copy of a loss chart presenting the transactions in the subject securities and summarizing the estimated losses of Local 705 at \$282,781.00 in connection with its purchases of shares of Adelphia Business Solutions.
- 5. Attached hereto as Exhibit D is the certification of Local 705.
- 6. Attached hereto as Exhibit E is a true copy of the firm resume of Milberg Weiss Bershad Hynes & Lerach LLP.

7.	Attached hereto as Exhibit F is a true	copy of the	firm resume	of Law Offices
	Bernard M. Gross, P.C.			
Dated	: July 9, 2002			
		Deborah R. Gross		